



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

SEP 14 2017

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Kenny McNaughton
Director Plant Operations
LV Stabler Memorial Hospital
29 LV Stabler Drive
Greenville, Alabama 36037

SUBJ: RCRA Compliance Evaluation Inspection
LV Stabler Memorial Hospital
EPA ID # ALR000049866

Dear Mr. McNaughton:

Enclosed is a copy of the U.S. Environmental Protection Agency inspection report documenting the results of the August 9, 2017, inspection of LV Stabler Memorial Hospital located at 29 LV Stabler Drive, Greenville, Alabama. This was an EPA compliance evaluation inspection (CEI) for the purpose of evaluating the facility's compliance with the applicable Resource Conservation and Recovery Act (RCRA) regulations.

A copy of this report has been forwarded to the Alabama Department of Environmental Management (ADEM) for follow-up. If you have any questions regarding this matter, please contact Paula Whiting by phone at (404) 562-9277 or by email at whiting.paula@epa.gov.

Sincerely,

Alan A. Annicella
Chief, Hazardous Waste Enforcement and
Compliance Section
Enforcement and Compliance Branch
Resource Conservation and Restoration Division

Enclosure

cc: Charmagne Boyd, Industrial Hazardous Waste Program, ADEM Land Division



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Vernon H. Crockett
Chief, Industrial Hazardous Waste Branch
Land Division
Alabama Department of Environmental Management
1400 Coliseum Boulevard
Montgomery, Alabama 36110-2059

SUBJ: RCRA Compliance Evaluation Inspection
LV Stabler Memorial Hospital
EPA ID Number: ALR000049866

Dear Mr. Crockett:

On August 9, 2017, a U.S. Environmental Protection Agency Compliance Evaluation Inspection was conducted at LV Stabler Memorial Hospital, located in Greenville, Alabama, to determine the facility's compliance status with the Resource Conservation and Recovery Act (RCRA).

Apparent deficiencies of RCRA were discovered during the inspection. Please follow-up with LV Stabler Memorial Hospital to ensure the deficiencies have been addressed.

Enclosed is a copy of the EPA inspection report. If you have any questions regarding this matter, please contact Paula Whiting, of my personnel, by phone at (404) 562-9277 or by email at whiting.paula@epa.gov.

Sincerely,

A handwritten signature in black ink, reading "Alan A. Annicella".

Alan A. Annicella
Chief, Hazardous Waste Enforcement and
Compliance Section
Enforcement and Compliance Branch
Resource Conservation and Restoration Division

Enclosure

RCRA Inspection Report

1) Inspector and Author of Report

Paula A. Whiting
Environmental Engineer
U.S. Environmental Protection Agency, Region 4
Hazardous Waste Enforcement and Compliance Section
Enforcement and Compliance Branch
Resource Conservation and Restoration Division
61 Forsyth Street, S.W.
Atlanta, Georgia 30303
(404) 562-9277

2) Facility Information

LV Stabler Memorial Hospital
29 LV Stabler Drive
Greenville, Alabama 36037
Butler County
EPA ID: ALR000049866

3) Responsible Official

Kenny McNaughton
Director Plant Operations
LV Stabler Memorial Hospital
29 LV Stabler Drive
Greenville, Alabama 36037

4) Inspection Participants

Kenny McNaughton	LV Stabler Memorial Hospital
Charmagne Boyd	ADEM Land Division
Paula Whiting	US EPA Region 4 Atlanta

5) Date and Time of Inspection

August 9, 2017 at 3:00 p.m. CDT

6) Applicable Regulations

Resource Conservation and Recovery Act (RCRA) Sections 3002, 3005 and 3007 (42 U.S.C. §§ 6922, 6925 and 6927), and the regulations promulgated pursuant thereto at 40 Code of Federal Regulations (C.F.R.) Parts 260-270, 273 and 279.

7) **Purpose of Inspection**

The purpose of the inspection was to conduct an unannounced RCRA compliance evaluation inspection (CEI) to determine the compliance of LV Stabler Memorial Hospital, EPA ID# ALR000049866 with the applicable regulations.

8) **Facility Description**

The LV Stabler Memorial Hospital located in Greenville, Alabama is 72-bed facility with inpatient, outpatient, medical and surgical care. The facility has 220 employees, and operates 24 hours a day, seven days a week. The facility was recently purchased by the City of Greenville, and will be operated by the University of Alabama Birmingham.

The LV Stabler Memorial Hospital's most recent Hazardous Waste Generator Notification (EPA Form 8700-12) dated October 3, 2014, characterized the facility as a small quantity generator (SQG) of hazardous waste.

Currently, LV Stabler Memorial Hospital may generate hazardous waste streams, used oil and universal wastes (such as spent batteries and certain types of lamps), waste solvent, spent aerosol cans, paint waste and other wastes which include EPA Waste Codes D001, D002, D007, D009, D010, D011, D022, D024, P001, P075 and U188.

9) **Previous Inspection History**

LV Stabler Memorial Hospital has never been inspected for RCRA by either ADEM or the EPA.

10) **Findings**

Upon arriving at the LV Stabler Memorial Hospital facility, the inspectors signed in at the reception desk before being escorted around the facility. The inspectors presented their credentials to Mr. McNaughton at 3:00 p.m. CDT.

A brief explanation for the purpose of the inspection was given, as well as an introduction of the ADEM and EPA inspectors. The inspectors requested a description of the facility operations. The inspectors then performed a walk-through inspection of specific areas in the facility. Below is a description of the observations made during the walk-through.

10.1 Maintenance

The maintenance offices and shop, located inside the hospital, provide general maintenance services for the facility. The inspectors observed one 4-foot universal waste lamp box that was not closed, not labeled and did not have an accumulation start date (Pictures 1-2). The maintenance staff wrote "Universal Waste Lamps" on the box and then taped both sides of the box (Picture 3). The inspectors

explained the date the lamps were removed from service should go on the box and not the date of the inspection.

Pursuant to ADEM Admin. Code r. 335-14-11-.03(6)(a) and (c) [40 C.F.R. § 273.15(a) and (c)], a Small Quantity Handler of Universal Waste (SQHUW) may accumulate universal waste no longer than one year and must be able to demonstrate the length of time that the universal waste has accumulated from the date that it became a waste or was received.

On August 16, 2017, Mr. Naughton provided via email a photograph of the universal waste lamp box with an accumulation start date of July 25, 2017.

10.2 Medical Waste Storage Shed

The Medical Waste Storage Shed was a separate structure from the hospital. At the time of the inspection, the shed did not contain any hazardous or medical waste. Mr. McNaughton stated a pickup of medical waste occurred that morning. No issues were observed in this area.

10.3 Pharmacy

The Pharmacy receives and distributes the medicines used by the facility. Dr. Kyle Sexton is the pharmacist. However, Dr. Sexton was not on-site at the time of the inspection, but Mr. James Graham, Technician, assisted the inspectors on this day.

The inspectors observed a waste diagram indicating which color bin was used for a specific waste pharmaceutical (Picture 17). The blue bin contains general waste medicine; black contains hazardous waste; red contains sharps and glass vials; and the black wire rack contains discarded patches. The inspectors observed the following satellite accumulation areas in the Pharmacy:

- Four black one-gallon bins and one blue 5-gallon bin of discarded pharmaceuticals (Picture 4);
- Two black 5-gallon bins of discarded inhalers (Pictures 5-7); and
- A box of expired medicines inside a bottom cabinet (Pictures 8-9). This box is a collection of recently pulled medicines from the nursing carts and the pharmacy in the last two weeks. The previous pickup by the reverse distributor was a month ago. The box is to be sorted by the reverse distribution company, EXP, headquartered in Fremont, CA with a local branch in Trussville, AL.

Unless otherwise noted, all bins were closed and labeled.

The inspectors requested copies of the reverse distribution list, a list of controlled substances, and the list of medications picked up by Stericycle on January 20, 2016.

On August 15, 2017 and, Mr. McNaughton and Dr. Sexton provided via email the following statement:

The weights are of P-listed waste which is Acutely hazardous. For LV Stabler, this consists only of nicotine patches and warfarin/Counadin/Jantoven tablets. The P-listed waste is both any unused drug (1/2 tabs of Coumadin, nicotine patch) and any wrappers from them (the blister pack the warfarin/Coumadin/jantoven comes in and the nicotine patch wrapper).

Additionally, Dr. Sexton provided via email attachments a list of P-listed waste and a list of all returns through INMAR for 2017.

10.4 Medical Surgery Unit 1 Nursing Station

The nursing station in the Medical Surgery Unit 1 stores the expired and spent medicines. The inspectors observed a red sharps bin, a blue general discarded medicine bin, a black hazardous waste medicine bin, a black wire rack for discarded hazardous patches, and a small black wall bin for hazardous waste (Pictures 10-16). A list of hazardous pharmaceuticals was posted near the Pyxis unit, which is used to distribute medication. Unless otherwise noted, all bins were closed and labeled.

10.5 ICU/CCU

The intensive care unit/critical care unit had a locked pharmaceutical closet behind the nursing station. The inspectors observed a Pyxis unit, a red sharps bin, a blue general discarded medicine bin, and a black hazardous waste medicine bin (Pictures 18-20). Unless otherwise noted, all bins were closed and labeled.

Records Review

After the walkthrough, the inspectors requested the 2016-2017 hazardous, non-hazardous, used oil and the universal waste manifests. The generator status notification (EPA Form 8700-12) was last updated October 3, 2014.

Hazardous and non-hazardous manifests were reviewed for 2016-2017. Hazardous waste was transported by Stericycle (EPA ID MNS000110924) shipped out on January 20, 2016 to Veolia Environmental Technical Solutions (EPA ID TXD000838896) in Port Arthur, TX. The land disposal restriction form was reviewed.

11) Summary

The inspectors conducted the exit meeting with Mr. McNaughton. During this meeting, the EPA and ADEM inspectors presented the preliminary results of the inspection. LV Stabler Memorial Hospital was inspected as a conditionally exempt small quantity generator of hazardous waste. At the time of the inspection, LV Stabler Memorial Hospital did not appear to be in compliance with some requirements of RCRA.

12) Signed



Paula A. Whiting
Environmental Engineer

9/13/17
Date

Concurrence



Alan A. Annicella, Chief
Hazardous Waste Enforcement and Compliance Section
Enforcement and Compliance Branch
Resource Conservation and Restoration Division

Date

9/14/17

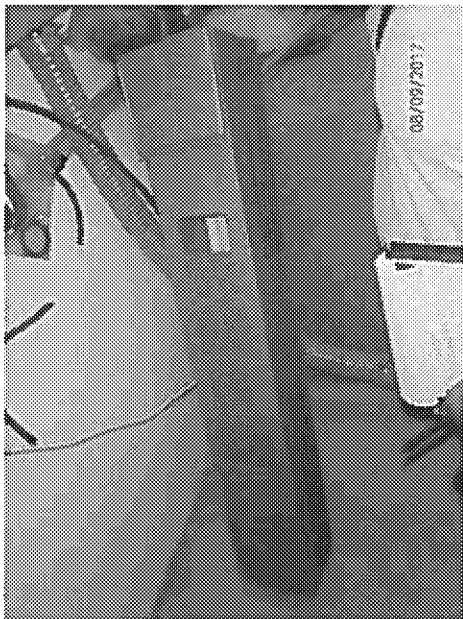
ATTACHMENT A

LV STABLER MEMORIAL HOSPITAL

GREENVILLE ALABAMA

COMPLIANCE EVALUATION INSPECTION PHOTOGRAPHS

AUGUST 9, 2017



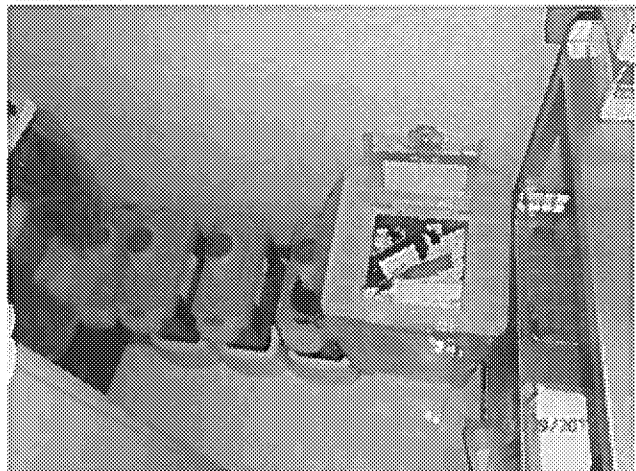
Picture 1 -- Maintenance universal waste lamp box



Picture 3 -- Maintenance UW lamp box closed and labeled



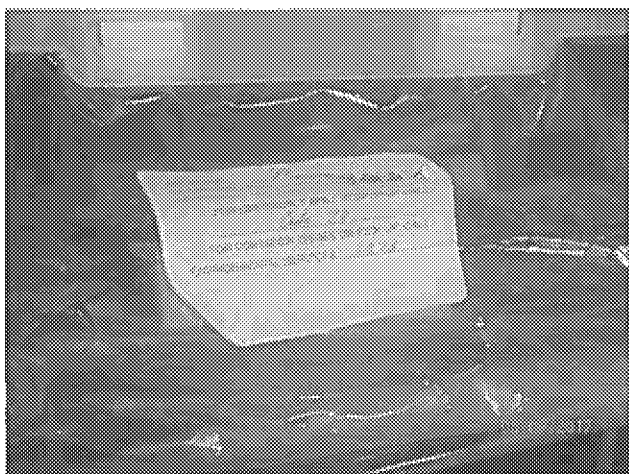
Picture 2 -- Maintenance universal waste lamps



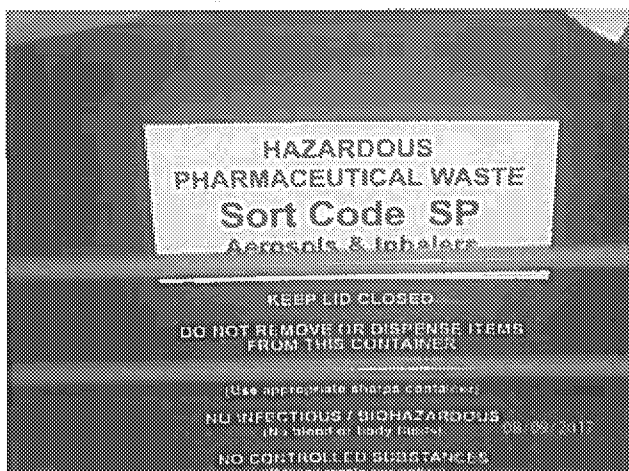
Picture 4 -- Pharmacy SAA



Picture 5 -- Pharmacy discarded inhaler bins



Picture 6 -- Pharmacy discarded inhaler bin label



Picture 7 -- Pharmacy discarded inhaler bin label



Picture 8 -- Pharmacy expired pharmaceuticals



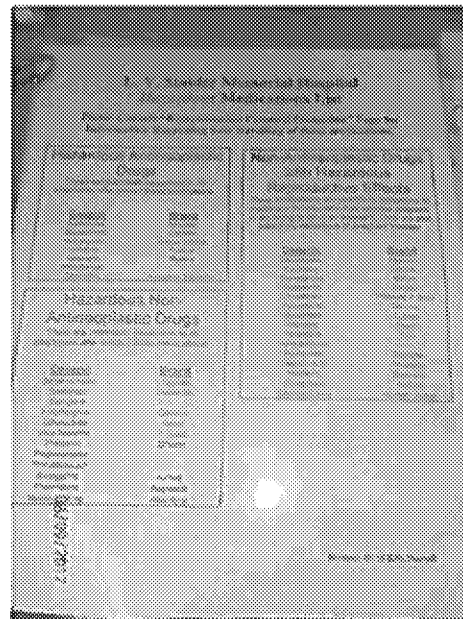
Picture 9 -- Pharmacy expired pharmaceuticals



Picture 10 -- Medical Surgery Unit 1 discarded sharps bin



Picture 11 -- Medical Surgery Unit 1 discarded medicine bins



Picture 13 -- Medical Surgery Unit 1 waste diagram



Picture 12 -- Medical Surgery Unit 1 discarded sharps bin



Picture 14 -- Medical Surgery Unit 1 discarded patches bin



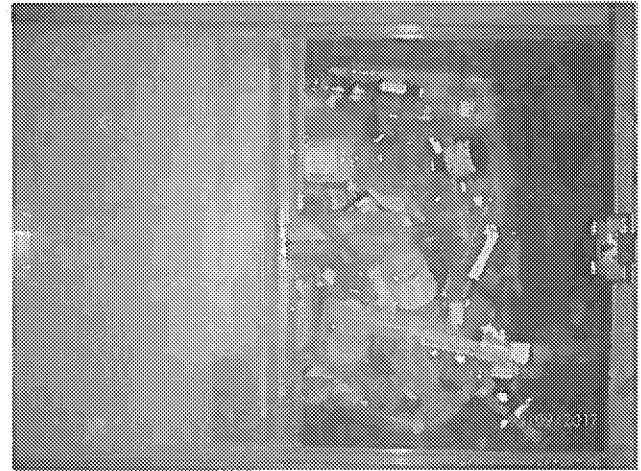
Picture 15 – Medical Surgery Unit 1 HW bin



Picture 16 – Medical Surgery Unit 1 inside HW bin



Picture 17 – ICU/CCU waste diagram



Picture 18 – ICU/CCU discarded sharps bin



Picture 19 – ICU/CCU discarded medicine bins



Picture 20 – ICU/CCU hazardous waste medicine bin